



October 23, 2007

Attn: Regulations and Standards Branch (RSB)
Department of the Interior
Minerals Management Service
381 Elden Street
MS-4024
Herndon, VA. 20170-4817

RE: **RIN 1010-AD11**
Pipeline and Pipeline Rights-of-way
Request for Time Extension for Comments to OMB

The Interstate Natural Gas Association of America (INGAA) is the trade association that represents interstate and interprovincial natural gas pipeline companies. INGAA's members operate the majority of pipelines that the Pipeline and Hazardous Materials Safety Administration (PHMSA) classifies as offshore gas transmission pipeline (6637 miles). A significant portion of that mileage of offshore pipeline is located in pipeline right of ways under the jurisdiction of the Mineral Management Service (MMS) of the Department of the Interior (DOI). The operation of these pipeline systems is subject to the requirements of Title 49 Code of Federal Regulation Parts 190, 191, 192, 193, and 199 and Title 30 Code of Federal Regulations Part 250, Subpart J, regarding Pipeline Rights-of-Way

INGAA is preparing comments per the notice at Volume 72, No. 191 FR 56442. INGAA believes that this rulemaking is significant and that the administrative burden has been underestimated, but it will take longer than the November 2 deadline to prepare complete comments on additional costs incurred because of the rule. INGAA therefore requests the deadline for comments to OMB be extended from November 2, 2007 to the same as that for the rule comments to DOI, January 31, 2008.

If you have any questions or require any additional information, please contact me at 202-216-5930 or tboss@ingaa.org.

Sincerely,

A handwritten signature in black ink that reads "Terry Boss". The signature is written in a cursive, flowing style.

Terry Boss
Senior Vice President, Safety and Environment

CC: Office of Management and Budget (OMB)
File